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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,  
Plaintiffs,  
v.  
GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTIONS TO SEAL**

Re: Dkt. Nos. 614, 623, 655, 682, 695, 707, 732,  
734, 797, 809, 815, 827, 833, 843, 848, 857,  
892, 893

Judge: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Google LLC submits this omnibus proposed order pursuant to the Court's Order Re: Pending Administrative Motions for Leave to File Under Seal (Dkt. 902). Before the Court are various pending motions to file under seal materials associated with Plaintiffs' Motion for Additional Discovery Sanctions and Google's Motion to Deprecate ("Motions"). Dkts. 614, 623, 655, 682, 695, 707, 732, 734, 797, 809, 815, 827, 833, 843, 848, 857, 892, 893. Having considered the Motions, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Dkt. Nos. of Original Sealing Motion and Declaration / Statement in Support of Sealing submitted pursuant to Civ. L.R. 79-5(c) or 79-5(f)(3)</b>	<b>Description of Document Sought to be Sealed</b>	<b>Page and Line Numbers of Text Sought to be Sealed</b>	<b>Basis for Sealing</b>
614 (Plaintiffs' Motion)  623 (Google's Declaration ISO Sealing)	Plaintiffs' Administrative Motion Regarding Court's May 20, 2022 Order  Dkts. 614-1, 623-2	GRANTED as to the portions at:  Highlighted portions of pages 1:6, 2:4-5, 2:13, 3:8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of

			such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
614 (Plaintiffs' Motion)  623 (Google's Declaration ISO Sealing)	Exhibit A to the Declaration of Mark Mao (Supplemental Declaration of Martin Sramek in Response to May 20, 2022 Order)  Dkts. 614-2, 623-3	GRANTED as to the portions at:  Highlighted portions of pages 2:14, 2:20, 2:24-28, 3:1, 3:3-10, 3:12-23, 3:27-28, 4:1-4, 6:1, 6:3-4, 6:6, 6:8-11, 6:13-27, 7:1, 7:3-9, 7:11-26, 8:1-13, 8:15-18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
614 (Plaintiffs' Motion)  623 (Google's Declaration)	Exhibit B to the Declaration of Mark Mao (Declaration of Martin Sramek in Response to May 20, 2022 Order)	GRANTED as to the portions at:  Highlighted portions of pages 1:23-26, 2:1-28, 3:1-16, 4:8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, as

1 2 3 4 5 6 7 8 9 10 11 12 13	ISO Sealing)	Dkts. 614-3, 623-4		well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	655 (Plaintiffs' Motion)  682 (Google's Declaration ISO Sealing)	Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624  Dkts. 655-1, 682-2	GRANTED as to the portions at:  Highlighted portions of pages 1:6, 1:17-23, 2:25, 3:1-2, 3:7, 3:12, 3:16-20, 3:23, 4:6, 4:17-18, 5:13-15, 5:24, 7:2-4, 8:6-9, 8:12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place

			Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion)  682 (Google's Declaration ISO Sealing)	Declaration of Christopher Thompson ISO Plaintiffs' Supplemental Sanctions Motion  Dkts. 655-3, 682-3	GRANTED as to the portions at:  Highlighted portions of pages 2:26, 3:19-20, 5:5-12, 5:19-20, 5:24, 5:26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal data signals and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion)  682 (Google's Declaration ISO Sealing)	Declaration of Mark C. Mao ISO Plaintiffs' Supplemental Sanctions Motion  Dkts. 655-6, 682-4	GRANTED as to the portions at:  Highlighted portions of pages 2:13-14, 2:17, 2:21	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business

			practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion)  682 (Google's Declaration ISO Sealing)	Exhibit A to the Mao Declaration ISO Plaintiffs' Supplemental Sanctions Motion  Dkts. 655-7, 682-5	GRANTED as to the portions at:  Highlighted portions of pages 1:13-15, 1:21-22	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
655 (Plaintiffs' Motion)	Plaintiffs' Proposed Order Granting Plaintiffs'	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	682 (Google's Declaration ISO Sealing)	Supplemental Sanctions Motion  Dkts. 655-9, 682-6	Highlighted portions of pages 3:21-26, 6:20, 6:24-7:1, 8:5-7, 8:20-23, 9:21- 24, 10:2, 10:6-7	internal systems and operations, including various types of Google's logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
16 17 18 19 20 21 22 23 24 25 26 27 28	695 (Google's Motion)	Google LLC's Opposition to Plaintiffs' Supplemental Sanctions Brief Pursuant to Dkt. 624  Dkt. 695-3	GRANTED as to the portions at:  Highlighted portions of pages 1:13, 2:6, 2:18, 2:22-23, 2:26, 2:28, 3:1-6, 3:8- 9, 4:10, 4:14, 5:12, 8:7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their



			systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
695 (Google's Motion)	Second Supplemental Declaration of Martin Sramek in Response to May 20, 2022 Order  Dkt. 695-4	GRANTED as to the portions at:  Highlighted portions of pages 1:10, 1:16-18, 2:18, 2:20-24, 2:26-3:3, 3:5-8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
695 (Google's Motion)	Exhibit 1 to Trebicka Declaration  Dkt. 695-5	GRANTED as to the portions at:  Highlighted portions of PDF pages 2-3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such



			confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
695 (Google's Motion)	Exhibit 2 to Trebicka Declaration  Dkt. 695-6	GRANTED as to the portions at:  Highlighted portions of pages 140:11, 140:14- 15, 140:18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	695 (Google's Motion)	Exhibit 3 to Trebicka Declaration  Dkt. 695-7	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18 19 20 21 22 23 24 25 26 27 28	695 (Google's Motion)	Exhibit 4 to Trebicka Declaration  Dkt. 695-8	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the

			Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
695 (Google's Motion)	Exhibit 5 to Trebicka Declaration  Dkt. 695-9	GRANTED as to the portions at:  Highlighted portions of pages 4:12, 4:18, 4:21, 5:14-15, 198:7, 198:18, 199:17, 201:4-5, 372:11, 372:15, 390:1-2, 390:15, 390:20	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
695 (Google's Motion)	Exhibit 7 to Trebicka Declaration  Dkt. 695-10	GRANTED as to the portions at:  Highlighted portions of pages 94:15-24, 96:4, 97:24, 101:11, 101:15, 101:18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and their proprietary functionalities, as well as internal

1			metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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14	695 (Google's Motion)	Exhibit 10 to Trebicka Declaration  Dkt. 695-11	GRANTED as to the portions at:  Highlighted portions of pages 409:1, 410:13, 410:17, 411:22, 412:5-6, 412:10, 412:12, 413:7, 415:19-21, 417:11, 419:23, 418:1, 418:4, 418:16, 419:23, 420:2, 420:7
15			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties
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			may seek to use the information to compromise Google's internal practices relating to competing products.
707 (Plaintiffs' Motion)  732 (Google's Declaration ISO Sealing)	Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief Pursuant to Dkt. 624  Dkts. 707-1, 732-2	GRANTED as to the portions at:  Highlighted portions of pages 1:26, 2:6, 2:22, 2:24-25, 3:1-4, 3:9, 3:23-24, 4:23	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
707 (Plaintiffs' Motion)  732 (Google's Declaration ISO Sealing)	Exhibit B of Mao Declaration  Dkts. 707-3, 732-3	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains privileged communications. Google gave notice to Plaintiffs of the inadvertently produced document subject to privilege on August 26, 2022. The document containing this information is currently the subject of Plaintiffs' Administrative Motion for Relief for Documents Improperly Withheld as Privileged (Dkt. 718). The information requested to be sealed also contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their

			<p>proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>707 (Plaintiffs' Motion)</p> <p>732 (Google's Declaration ISO Sealing)</p>	<p>Exhibit C of Mao Declaration</p> <p>Dkts. 707-4, 732-4</p>	<p>GRANTED as to the portions at:</p> <p>Sealed Entirely</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may</p>

			also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
707 (Plaintiffs' Motion)  732 (Google's Declaration ISO Sealing)	Exhibit D of Mao Declaration  Dkts. 707-5, 732-5	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
734 (Google's Motion)	Exhibit 1 to Google's Sur-Reply to Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief  Dkt. 734-3	GRANTED as to the portions at:  Highlighted portions of pages 2:5-8, 3:4, 3:6, 3:8, 3:10-15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal databases, logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal



			strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal data logging infrastructure.
734 (Google's Motion)	Trebicka Exhibit A (Excerpts from the Deposition of Rory McClelland)  Dkt. 734-4	GRANTED as to the portions at:  Highlighted portions of pages 165:3-4, 166:11-13, 166:17-24	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal data logging infrastructure.
797	Google LLC'S Response to the	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Google's Motion)	Court's October 27, 2022 Order to Show Cause (Dkt. 784)  Dkt. 797-3	Highlighted portions of pages i:8, i:11, i:13-19, 3:13, 3:23-24, 4:4, 4:17, 4:19, 4:22, 4:27, 5:3-5, 5:13-15, 5:20, 5:22-23, 5:25, 5:27, 6:1, 6:3, 6:5, 6:7, 6:9, 6:17-19, 6:27, 7:9-10, 7:12, 7:15-17, 7:21-23, 7:25-28, 8:1-3, 8:5-10, 8:12, 8:14-15, 8:18-26, 9:1-2, 9:4-9, 9:11-12, 9:14-16, 9:18-26, 10:1-12, 10:16-26, 10:28, 11:1-16, 11:18-20, 11:22-28, 12:1, 12:3-4, 12:6-16, 16:4-6, 16:21, 17:1-3, 17:28, 18:1-2, 18:8-9, 22:5-7, 22:10	and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18 19 20 21 22 23 24 25 26 27 28	797 (Google's Motion)	Trebicka Exhibit 2 (6/17/21 Berntson Depo Trans. Excerpts)  Dkt. 797-4	GRANTED as to the portions at:  Highlighted portions of pages 4:12, 4:18, 4:21, 5:5-6, 198:7, 198:18, 199:17, 201:4-5, 372:11, 372:15, 375:9, 395:24, 396:14	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the

			Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Trebicka Exhibit 3 (2/18/22 McClelland Depo Trans. Excerpts)  Dkt. 797-5	GRANTED as to the portions at:  Highlighted portions of pages 230:24, 231:6-8, 231:10, 231:17- 19, 231:21, 231:23-25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Declaration of Matthew Harren  Dkt. 797-6	GRANTED as to the portions at:  Highlighted portions of pages	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations,

1		1:13, 1:15-16, 1:27-28, 2:1-2, 2:4-6, 2:10-18, 2:10-22, 2:25- 26, 2:28, 3:1	including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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16	797 (Google's Motion)	Declaration of Vineet Kahlon  Dkt. 797-7	GRANTED as to the portions at:  Highlighted portions of pages 1:15-16, 1:20, 1:22-28, 2:5, 2:14-17, 2:19, 2:21-3:1, 3:4, 3:7-12
17			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
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			information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Kahlon Exhibit A (GOOG-CABR- 04430230)  Dkt. 797-8	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Kahlon Exhibit C (GOOG-CABR- 04737037)  Dkt. 797-9	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their

1			proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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15	(Google's	Maciej Kuzniar	the portions at:
16	Motion)	Dkt. 797-10	Highlighted
17			portions of pages
18			1:12, 1:17, 1:19,
19			1:22-23, 1:25-
20			27, 2:2, 2:4, 2:9,
21			2:12-18, 2:20-22
22			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices
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			relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Kuzniar Exhibit A (GOOG-BRWN- 00858547)  Dkt. 797-11	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Declaration of Eugene Lee  Dkt. 797-12	GRANTED as to the portions at:  Highlighted portions of pages 1:14, 1:17, 1:19, 1:21-26, 2:1, 2:3-7, 2:12-13, 2:15-17, 2:19- 21, 2:27-28, 3:2- 7, 3:10-15, 3:18-	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of



		20, 3:22, 3:24-4:4, 4:6, 4:8-12, 4:15-20, 4:23-24, 4:26-27, 5:4, 5:6-22, 5:26-6:8, 6:11-17, 6:20-25, 6:27, 7:1-2, 7:5	its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Lee Exhibit A (GOOG-BRWN-00858554)  Dkt. 797-13	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties

			may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Lee Exhibit B (GOOG-BRWN- 00858520)  Dkt. 797-14	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Declaration of Xianzhi Liu  Dkt. 797-15	GRANTED as to the portions at:  Highlighted portions of pages 1:14, 1:19-28, 2:1-9, 2:11-12, 2:14-19, 2:23- 27, 3:1	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary

1			information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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11	797 (Google's Motion)	Liu Exhibit A (GOOG-BRWN- 00858530)  Dkt. 797-16	GRANTED as to the portions at:  Sealed Entirely
12			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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19 20 21 22 23 24 25 26 27 28	797 (Google's Motion)	Maki Exhibit A (GOOG-BRWN- 00858548)  Dkt. 797-18	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining

			many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Declaration of Vasily Panferov  Dkt. 797-19	GRANTED as to the portions at:  Highlighted portions of pages 1:18, 1:20-24, 1:26-2:4, 2:7-25, 3:8-9, 3:11-13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Declaration of Martin Sramek	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding

1		Dkt. 797-20	Highlighted portions of pages 1:21, 1:26-27, 2:2, 2:9	highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
17	797 (Google's Motion)	Declaration of Konstantinos Psounis  Dkt. 797-21	GRANTED as to the portions at:  Highlighted portions of pages 1-13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action.

			See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
797 (Google's Motion)	Psounis Exhibit B (GOOG-BRWN-00858535)  Dkt. 797-22	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
809 (Google's Motion)	Google LLC's Administrative Motion Requesting Leave to Deprecate  Dkt. 809-4	GRANTED as to the portions at:  Highlighted portions of pages 1:2, 1:8-14, 1:18,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's



1		1:23, 2:2, 2:5-26, 3:8-16	internal projects, internal databases, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, including anti-fraud services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices.
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16	809 (Google's Motion)	Declaration of Borbala Benko  Dkt. 809-5	GRANTED as to the portions at:  Highlighted portions of pages 1:13-17, 1:20- 3:3
17			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal databases, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, including anti-fraud services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's
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14	815 (Plaintiffs' Motion)	Plaintiffs' Response to Google's Administrative Motion (Dkt. 810)	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
15	827 (Google's Declaration ISO Sealing)	Re: Newly Revealed Incognito- Detection Bit  Dkts. 815-1, 827-2	Highlighted portions of pages 1:3, 2:18, 2:24, 2:27, 3:3-4, 4:4- 5, 4:8, 4:14	
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16 17 18 19 20 21 22 23 24 25 26 27 28	815 (Plaintiffs' Motion)  827 (Google's Declaration ISO Sealing)	Exhibit 2 to Mao Declaration  Dkts. 815-3, 827-4	GRANTED as to the portions at:  Highlighted portions of PDF pages 2-3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and their proprietary functionalities that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to

			compromise Google's internal practices relating to competing products.
815 (Plaintiffs' Motion)  827 (Google's Declaration ISO Sealing)	Exhibit 3 to Mao Declaration  Dkts. 815-4, 827-5	GRANTED as to the portions at:  Highlighted portions of pages 10:7-8, 149:21, 150:1, 150:12-13, 151:8, 152:4-5, 152:25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular internal project, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies and business practices, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)  843 (Google's Declaration ISO Sealing)	Plaintiffs' Response to the Court's Order to Show Cause (Dkt. 784)  Dkts. 833-1, 843-2	GRANTED as to the portions at:  Highlighted portions of pages i:19, i:21, 1:9-12, 1:15, 1:18, 2:19, 2:23, 2:25, 3:27, 4:22, 6:3, 6:19, 7:13, 7:18-22, 8:11, 8:19, 8:22-23, 9:1, 9:12, 9:23-24, 9:26, 11:11, 11:22-23, 11:25-27, 12:2, 12:4-5, 12:8, 12:14-15, 12:22, 13:3-4, 13:13, 13:18, 13:20, 14:6-7, 14:10, 14:13, 14:17, 14:25, 16:1, 16:3, 16:8-9,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of internal projects, data fields and logs, and their proprietary functionalities, as well as internal metrics, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats,

1			16:12–13, 16:19, 16:25–26, 17:7, 17:12, 17:15–16, 18:9, 24:8, 25:27	as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
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3	833 (Plaintiffs’ Motion)	Exhibit 1 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
4	843 (Google’s Declaration ISO Sealing)	Dkts. 833-2, 843-3	Highlighted portions of pages 8:14, 8:26, 10:5, 10:13, 10:24	
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17	833 (Plaintiffs’ Motion)	Exhibit 2 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk
18	843 (Google’s Declaration ISO Sealing)	Dkts. 833-2, 843-4	Highlighted portions of PDF pages 4–6	
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			of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)	Exhibit 3 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular data field and its proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies and business practices, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
843 (Google's Declaration ISO Sealing)	Dkts. 833-2, 843-5	Highlighted portions of pages 1–2	
833 (Plaintiffs' Motion)	Exhibit 4 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular data field, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties
843 (Google's Declaration ISO Sealing)	Dkts. 833-2, 843-6	Highlighted portions of PDF pages 2–3	

			may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)	Exhibit 6 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including an internal project, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information sought to be sealed also contains an individual's personally identifying information.
843 (Google's Declaration ISO Sealing)	Dkts. 833-2, 843-7	Highlighted portions of pages 10:7–8, 13:12, 149:21, 150:1, 150:12–13, 151:8, 152: 4–5, 152:25	
833 (Plaintiffs' Motion)	Exhibit 7 to the Declaration of Mark Mao	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such
843 (Google's Declaration ISO Sealing)	Dkts. 833-2, 843-8	Highlighted portions of PDF pages 4–5	



			confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)  843 (Google's Declaration ISO Sealing)	Declaration of Christopher Thompson ISO Plaintiffs' Supplemental Sanctions Brief  Dkts. 833-3, 843-9	GRANTED as to the portions at:  Highlighted portions of pages 2:6, 2:17–18, 2:20, 2:25, 3:11, 3:27, 4:1, 4:5-6, 4:13, 5:7, 5:11, 5:13–15, 6:3, 6:5–6, 6:8–13, 6:15–16, 6:18–28, 7:1–2, 7:5–6, 7:24–27, 8:17, PDF page 13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of internal projects, data fields and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
833 (Plaintiffs' Motion)  843 (Google's Declaration ISO Sealing)	Declaration of Jay Bhatia ISO Plaintiffs' Response to Google's Response to the Order to Show Cause  Dkts. 833-4, 843-10	GRANTED as to the portions at:  Highlighted portions of pages 2:3–5, 2:12, 3:3–6, 3:8–10, 3:14–16, 3:18–19, 3:22, 3:26–27, 4:7, 4:9, 4:11–12, 4:16–17, 4:20	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including source code, particular data fields and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business

			practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
848 (Google’s Motion)	Joint Status Report Pursuant to <i>Brown</i> Dkt. 830  Dkt. 848-3	GRANTED as to the portions at:  Highlighted portions of pages 1:11-12, 1:14, 1:23, 1:25, 1:28, 2:1-3, 2:5-6, 2:9- 10, 2:13-15, 2:18-19, 2:24, 3:5-9, 3:12, 3:19, 4:3-6, 4:8, 4:16, 4:27, 5:2, 5:13, 5:27, 6:13-14, 6:16-22, 6:24- 28, 7:1-2, 7:7, 7:9, 7:12	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential information reveals Google’s internal systems and operations. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
848 (Google’s Motion)	Exhibit 1 to Trebicka Declaration (Jan. 10, 2023 <i>Brown</i> Hearing Transcript)  Dkt. 848-4	GRANTED as to the portions at:  Highlighted portions of pages 7:15-16, 8:9-10, 8:18, 8:21-22, 9:2-3, 9:5, 9:25, 12:5, 12:18, 12:25, 13:4, 15:16-18, 15:25,	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects, internal data sources, and their proprietary functionalities, which

1			16:8, 16:11-12, 17:6, 17:8, 18:6- 10, 18:13-16, 18:18, 19:17-18, 20:11, 21:23-24, 22:25, 26:10, 28:10, 28:21-22, 29:1-2, 29:4-7, 29:10-11, 29:16, 30:4, 31:23, 34:22-24, 35:19, 35:22-23, 35:25	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
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9	848 (Google's Motion)	Exhibit 2 to Trebicka Declaration (Jan. 26, 2023 Letter to <i>Brown</i> and <i>Calhoun</i> )  Dkt. 848-5	GRANTED as to the portions at:  Highlighted portions of pages 1-6	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
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24	848 (Google's Motion)	Exhibit 3 to Trebicka Declaration (Jan. 28, 2023 Letter to <i>Brown</i> and <i>Calhoun</i> )  Dkt. 848-6	GRANTED as to the portions at:  Highlighted portions of pages 1-2	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal
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			projects and internal databases, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential information reveals Google’s internal systems and operations. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
848 (Google’s Motion)	Exhibit 4 to Trebicka Declaration (Jan. 30, 2023 Letter to <i>Brown</i> and <i>Calhoun</i> )  Dkt. 848-7	GRANTED as to the portions at:  Highlighted portions of pages 1-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential information reveals Google’s internal systems and operations. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
848 (Google’s Motion)	Exhibit 5 to Trebicka Declaration (Jan. 10, 2023 <i>Calhoun</i> Hearing Transcript)  Dkt. 848-8	GRANTED as to the portions at:  Highlighted portions of pages 5:25, 6:2, 6:4, 6:13, 8:1, 8:3, 17:11, 18:20,	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including

1		18:25, 19:1-2,	various types of Google's internal
2		21:1, 21:22,	projects and internal databases, as well
3		22:21, 25:5,	as internal metrics, which Google
4		25:17, 25:20,	maintains as confidential in the ordinary
5		25:23, 26:4,	course of its business and is not
6		26:8-10, 26:16-	generally known to the public or
7		17, 28:1	Google's competitors. Such
8			confidential information reveals
9			Google's internal systems and
10			operations. Public disclosure of such
11	848	GRANTED as to	confidential information could affect
12	(Google's	the portions at:	Google's competitive standing as
13	Motion)	Highlighted	competitors may alter their system
14		portions of pages	designs and practices relating to
15		1, 3-4	competing products, time strategic
16	Exhibit 6 to Trebicka		litigation, or otherwise unfairly compete
17	Declaration		with Google.
18	(Jan. 23, 2023		
19	correspondence)		
20	Dkt. 848-9		
21			
22			
23			
24			
25	857		
26	(Google's		
27	Motion)		
28	857	GRANTED as to	The information requested to be sealed
	(Google's	the portions at:	contains non-public, sensitive
	Motion)		confidential business information
	Google LLC's Reply		related to Google's internal
	in Support of Its		technological systems that could affect
	Response to the		Google's competitive standing and may
	Court's October 27,		expose Google to increased security
			risks if publicly disclosed, including
			various types of Google's internal
			projects and internal databases, which
			Google maintains as confidential in the
			ordinary course of its business and is not
			generally known to the public or
			Google's competitors. Such
			confidential information reveals
			Google's internal systems and
			operations. Public disclosure of such
			confidential information could affect
			Google's competitive standing as
			competitors may alter their system
			designs and practices relating to
			competing products, time strategic
			litigation, or otherwise unfairly compete
			with Google.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	2022 Order to Show Cause (Dkt. 784)  Dkt. 857-3	Highlighted portions of pages i:8, 1:20, 1:22, 2:1, 4:7–8, 4:14–15, 4:17–19, 5:7, 5:15, 5:17, 5:19–20, 5:28, 6:6, 6:12, 6:14, 6:16, 6:21, 6:24, 7:20, 8:8, 8:13, 9:7, 9:11, 9:13, 9:16, 11:6, 11:8, 11:10–11, 11:18–19, 12:1–3, 12:13, 12:22–23, 13:18, 13:21, 14:2, 14:6, 16:12, 17:26, 19:2, 19:6, 19:8, 19:12, 19:18, 20:7	internal systems and operations, including various internal projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
16 17 18 19 20 21 22 23 24 25 26 27 28	857 (Google’s Motion)  Declaration of Carl Spilly ISO Google LLC’S Reply ISO Its Response to the Court’s October 27, 2022 Order to Show Cause (Dkt. 784)  Dkt. 857-4	GRANTED as to the portions at:  Highlighted portions of pages 2:26–3:1, 4:10, 4:12–16, 4:18, 5:2, 5:9–10, 5:12, 7:6, 7:18–19	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects, internal data sources, and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their



			systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
857 (Google's Motion)	Spilly Declaration. Exhibit 1 (Email chain re: Google's Response to Order to Show Cause)  Dkt. 857-5	GRANTED as to the portions at:  Highlighted portions of pages 4–6, 11, 13	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
857 (Google's Motion)	Spilly Declaration. Exhibit 2 (Email chain re: Brown v. Google – Source Code)  Dkt. 857-6	GRANTED as to the portions at:  Highlighted portions of pages 4–7	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary



			information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
857 (Google's Motion)	Spilly Declaration. Exhibit 3 (Supplemental Declaration of Eugene Lee)  Dkt. 857-7	GRANTED as to the portions at:  Highlighted portions of pages 1:12, 1:14, 1:17- 18, 1:20-24, 1:26-28, 2:1-6, 2:8, 2:10-17, PDF pages 4-18	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	857 (Google's Motion)	Spilly Declaration. Exhibit 4 (GOOG-CABR- 00058527)  Dkt. 857-8	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and strategies, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18 19 20 21 22 23 24 25 26 27 28	857 (Google's Motion)	Spilly Declaration. Exhibit 5 (GOOG-CABR- 04131930)  Dkt. 859-9	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and strategies, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the

			Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
857 (Google’s Motion)	Spilly Declaration. Exhibit 6 (GOOG-BRWN- 00029182)  Dkt. 857-10	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
857 (Google’s Motion)	Spilly Declaration. Exhibit 7 (GOOG-CABR- 04118195)  Dkt. 857-11	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects and

1			strategies, internal data sources and
2			logs, and their proprietary
3			functionalities, that Google maintains as
4			confidential in the ordinary course of its
5			business and is not generally known to
6			the public or Google's competitors.
7			Such confidential and proprietary
8			information reveals Google's internal
9			strategies, system designs, and business
10			practices for operating and maintaining
11			many of its important services, and falls
12			within the protected scope of the
13			Protective Order entered in this action.
14			<i>See</i> Dkt. 81 at 2–3. Public disclosure of
15	857	Spilly Declaration.	such confidential and proprietary
16	(Google's	Exhibit 8	information could affect Google's
17	Motion)	(GOOG-BRWN- 00428101)	competitive standing as competitors
18		Dkt. 857-12	may alter their systems and practices
19			relating to competing products. It may
20			also place Google at an increased risk of
21			cybersecurity threats, as third parties
22			may seek to use the information to
23			compromise Google's internal practices
24			relating to competing products.
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	857	Spilly Declaration.	The information requested to be sealed
	(Google's	Exhibit 8	contains Google's highly confidential
	Motion)	(GOOG-BRWN- 00428101)	and proprietary information regarding
		Dkt. 857-12	highly sensitive features of Google's
			internal systems and operations,
			including various internal projects and
			strategies, that Google maintains as
			confidential in the ordinary course of its
			business and is not generally known to
			the public or Google's competitors.
			Such confidential and proprietary
			information reveals Google's internal
			strategies, system designs, and business
			practices for operating and maintaining
			many of its important services, and falls
			within the protected scope of the
			Protective Order entered in this action.
			<i>See</i> Dkt. 81 at 2–3. Public disclosure of
			such confidential and proprietary
			information could affect Google's
			competitive standing as competitors
			may alter their systems and practices
			relating to competing products. It may
			also place Google at an increased risk of

			cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
857 (Google's Motion)	Spilly Declaration. Exhibit 10 (Plaintiffs' RFPs to Google, Set 6)  Dkt. 857-13	GRANTED as to the portions at:  Highlighted portions of pages 10:12, 10:15, 11:20, 11:22–23, 16:9	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
857 (Google's Motion)	Spilly Declaration. Exhibit 11 (Berntson Exhibit 13 - Berntson Fact Sheet)  Dkt. 857-14	GRANTED as to the portions at:  Highlighted portions of pages 3–12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal identifiers, internal data sources, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining

			many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
857 (Google’s Motion)	Declaration of Steven Ellis  Dkt. 857-15	GRANTED as to the portions at:  Highlighted portions of pages 2:3, 2:13, 3:1, 3:3, 3:6-9, 3:12– 18, 3:22–23, 3:27, 4:1, 4:28	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various internal projects, source code, and internal data sources, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
857 (Google’s Motion)	Exhibits A-D to Declaration of Steven Ellis  Dkt. 857-16	GRANTED as to the portions at:  Sealed Entirely	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations,

1			including various internal projects, internal data sources and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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15	857 (Google's Motion)	Declaration of Konstantinos Psounis, Ph.D.  Dkt. 857-17	GRANTED as to the portions at:  Highlighted portions of pages i:16–17, i:23, i:28, ii:2–3, 2:18–19, 3:25– 27, 4:4, 4:10, 4:12–13, 10:13– 14, 10:19, 10:22, 11:6, 13:7–8, 16:4-5, 16:10, 16:12, 16:25, 23:2, 23:8-9, 23:13, 23:15–16, 23:22, 23:28, 24:8, 24:11, 24:19, 24:24, 24:28–25:1, 25:5-7, 25:13, 25:21–24, 26:1, 26:7, 26:9, 26:21–24, 27:6
16			The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to
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			competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
892 (Google's Motion)	March 2, 2023 Hearing Slides  Dkt. 892-2	GRANTED as to the portions at:  Sealed Entirely	The Court has already ordered these materials sealed. Dkt. 891.  Moreover, the information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
893 (Plaintiffs' Motion)	Slides presented at the March 2, 2023 Hearing  Dkt. 893-1	GRANTED as to the portions at:  Sealed Entirely	The Court has already ordered these materials sealed. Dkt. 891.  Moreover, the information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal

projects, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

**SO ORDERED.**

DATED: \_\_\_\_\_

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HON. SUSAN VAN KEULEN  
UNITED STATES MAGISTRATE JUDGE